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28 *Pro Internet Services, Inc., Revive Marketing, Inc. Success Marketing, Inc., Summit Processing, Inc.*  
29 *Tran Voyage, Inc., TranFirst, Inc., Unlimited Processing, Inc., and eCom Success, Inc.*

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31 **UNITED STATES DISTRICT COURT**  
32 **FOR THE DISTRICT OF NEVADA**

33 FEDERAL TRADE COMMISSION,

34 Case No.: 2:10-cv-2203-MMD-GWF

35 Plaintiff(s),

36 v.

37 JEREMY JOHNSON, et al.

38 Defendant(s).

39  
40 **STIPULATED MOTION TO TAKE THE DEPOSITION**  
41 **OF JEREMY JOHNSON ON SEPTEMBER 5, 2013**

1 By this stipulated motion, the parties move the Court to allow them to take the  
2 deposition of Jeremy Johnson on September 5, 2013. This date is beyond the regular fact  
3 discovery deadline. However, availability issues regarding counsel have arisen that the parties  
4 have been unable to work around. Pursuant to a previous order of Judge Du, the parties were  
5 permitted to take another deposition (Scott Leavitt) by the end of August. However, Mr.  
6 Leavitt's counsel is unavailable during the last week of August. He, therefore, requested that  
7 the FTC agree to depose Mr. Leavitt on September 6. The FTC noted to Mr. Leavitt's counsel  
8 that it could not justify separate trips for Mr. Leavitt and Mr. Johnson's depositions. Thus, the  
9 FTC conditioned agreeing to stipulate to depose Mr. Leavitt on September 6 on Mr. Johnson's  
10 depositions being held on September 5. IWorks has no objection to this schedule, and agrees  
11 that it would be convenient for all parties to have the deposition of Mr. Johnson taken at around  
12 the same time.

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14 DATED this 9th day of August, 2013.

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16 **CHRISTENSEN & JENSEN, P.C.**

17  
18 /s/ Karra J. Porter  
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*Funding Solutions, Inc., Money Harvest, Inc., Monroe*  
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*Inc., Pro Internet Services, Inc., Revive Marketing, Inc. Success*  
*Marketing, Inc., Summit Processing, Inc., Tran Voyage, Inc.,*  
*TranFirst, Inc., Unlimited Processing, Inc., and eCom Success,*  
27 *Inc.*

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DATED this 9th day of August, 2013.

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/s/ Collot Guerard

Collot Guerard

J. Ronald Brooke, Jr.

Janice L. Kopec

Dotan Weinman

Attorneys for Federal Trade Commission

(signed with permission)

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**IT IS SO ORDERED:**

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10 GEORGE FOLEY, JR.

11 United States Magistrate Judge

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DATED: August 12, 2013

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